

# Exhibit “K”

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

IN RE: NEW ENGLAND )  
COMPOUNDING PHARMACY, )  
INC. PRODUCT LIABILITY )  
LITIGATION. )  
 )MDL NO. 2419  
 )Master Dkt:  
THIS DOCUMENT RELATES TO: )1:13-md-02419-RWZ  
 )  
All Actions )  
\_\_\_\_\_ )

VIDEOTAPED DEPOSITION OF:

REBECCA CLIMER

Taken on behalf of the Plaintiff

July 15, 2015

\_\_\_\_\_  
CARISSA L. BOONE, LCR, RPR

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1     though that it had the right to --

2     A.       St. Thomas Network --

3     Q.       -- appoint two board members?

4     A.       St. Thomas -- that is the extent of it.

5     St. Thomas Network is a -- an entity, a holding

6     company for a number of different joint

7     ventures. It has a -- it has a -- it appoints

8     board members, but it does not actively manage

9     the day-to-day operations of the center.

10    Q.       What is the -- what is your understanding

11    of -- so you -- strike that.

12            What do you mean by "does not manage the  
13    center"?

14    A.       It does not manage -- St. Thomas Network  
15    doesn't have a management function.

16    Q.       You mean it does not have a management  
17    function in the operation of the center?

18    A.       That's correct. And billing practices  
19    would be handled by whomever had the management  
20    function for the center.

21    Q.       Did you ever disclose to The Tennessean  
22    that St. Thomas Health, through the St. Thomas  
23    Network, had the right to appoint two members to  
24    the board that oversaw the operations of the  
25    center?

## 1 REPORTER'S CERTIFICATE

2 I certify that the witness in the  
3 foregoing deposition, REBECCA CLIMER, was by me  
4 duly sworn to testify in the within entitled  
5 cause; that the said deposition was taken at the  
6 time and place therein named; that the testimony  
7 of said witness was reported by me, a Shorthand  
8 Reporter and Notary Public of the State of  
9 Tennessee authorized to administer oaths and  
10 affirmations, and said testimony, Pages 7  
11 through 161 was thereafter transcribed into  
12 typewriting.

13 I further certify that I am not of  
14 counsel or attorney for either or any of the  
15 parties to said deposition, nor in any way  
16 interested in the outcome of the cause named in  
17 said deposition.

18 IN WITNESS WHEREOF, I have hereunto set  
19 my hand this 24th day of July, 2015.  
20  
21  
22  
23

24 \_\_\_\_\_  
25 Carissa L. Boone, LCR No. 382  
My License Expires: 5/08/2017